

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

JOSHUA GARCIA, ANDREA P. BRANDT)	
and HOWARD HART, individually and on)	
behalf of all others similarly situated,)	Civil Action No. 1:20-cv-01078
	Hon. Paul L. Maloney
Plaintiffs,)	Mag. Phillip J. Green
)
v.))
)
ALТИCOR, INC., THE BOARD OF)	
DIRECTORS OF ALTIKOR, INC., THE)	
FIDUCIARY COMMITTEE OF ALTIKOR,)	
INC., and JOHN DOES 1-30,)	
)
Defendants.)	

**PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES AND
CASE CONTRIBUTION AWARDS**

Plaintiffs Joshua Garcia, Andrea P. Brandt, and Howard Hart ("Plaintiffs"), participants in the Amway Retirement Savings Plan (the "Plan"), hereby respectfully move this Court, pursuant to FED. R. CIV. P. 23, for an Order:

1. Granting class counsel attorneys' fees in the amount of amount of \$503,283.00, which represents approximately 33 1/3% of the settlement amount;
2. Directing reimbursement to Class Counsel in the amount of \$53,306.73 of expenses incurred in the prosecution of the action;
3. Awarding a case contribution award of \$10,000 to each of the Plaintiffs (Joshua Garcia, Andrea P. Brandt, and Howard Hart); and
4. For such other relief as the Court may deem just and proper.

A proposed form of Order is submitted hereto. The grounds for this Motion are set forth in

the following documents filed contemporaneously herewith:

- A. Memorandum of Law In Support of Plaintiffs' Motion for Award of Attorneys' Fees and Reimbursement of Expenses, and Case Contribution Awards;
- B. Declaration of Mark K. Gyandoh In Support of Plaintiffs' Motion for Final Approval of Settlement and In Support of Plaintiffs' Motion for An Award of Attorneys' Fees, Reimbursement of Expenses and Case Contribution Awards;
- C. Declaration of Plaintiff Joshua Garcia In Support of Plaintiffs' Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards.
- D. Declaration of Plaintiff Andrea P. Brandt In Support of Plaintiffs' Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards.
- E. Declaration of Plaintiff Howard Hart In Support of Plaintiffs' Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards.

Dated: October 4, 2024

Respectfully submitted,

CAPOZZI ADLER, P.C.

/s/ Mark K. Gyandoh
Mark K. Gyandoh, Esquire
(admitted *pro hac vice*)
312 Old Lancaster Road Merion
Station, PA 19066
Tel: (610) 890-0200
Fax: (717) 233-4103
Email: markg@capozziadler.com

*Attorneys for Plaintiffs, the Plan
and the Proposed Class*

CERTIFICATE OF SERVICE

I hereby certify that on October 4, 2024, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

By: /s/ Mark K. Gyandoh
Mark K. Gyandoh, Esq.